

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

> OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

August 3, 2009

Frank Roberts, Zone Planner Thorne Bay Ranger District Tongass National Forest PO Box 19001 Thorne Bay, Alaska 99919

RE:

U.S. Environmental Protection Agency (EPA) Comments on AFS Logjam

Timber Sale FEIS/ROD

EPA Project Number: 05-030-AFS

Dear Mr. Roberts:

The EPA has completed its review of the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Logjam Timber Sales project (CEQ No. 20090217) on the Thorne Bay Ranger District, Tongass National Forest, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA rated the draft EIS and Proposed Alternative (Alternative 2) as EC-1 (Environmental Concerns-Adequate Information) primarily due to concerns regarding potential impacts to water quality and aquatic and wildlife resources due to road construction. We recommended selection of Alternative 3 or 4. The FEIS and ROD indicate that the Forest Service (FS) has identified Alternative 5 as its Selected Alternative. This alternative includes fewer harvest acres, board-feet, and new and temporary roads than Alternative 2, although substantially more than Alternatives 3 or 4. Modifications were made to the Selected Alternative to allow for work involving roads requiring repair due to acid-rock drainage to be completed before roads would be constructed in those impacted areas. Monitoring will take place to ensure no new acid rock drainage occurs.

EPA continues to be concerned that FS did not select an alternative with less potential for impacts, particularly given the potential for acid rock drainage to negatively impact water quality in certain areas proposed for construction. We do believe, however, that potential impacts are adequately described, and that the proposed mitigation and monitoring, if strictly adhered to, will help to ensure that impacts are minimized. We are also pleased that the selected Alternative does not involve the construction of roads in Inventoried Roadless Areas (IRAs).

We appreciate the FS's consideration of our comments on the draft EIS and revisions to reflect the delegation of the National Pollution Discharge Elimination System (NPDES) program



under Section 402 of the Clean Water Act to the State of Alaska. We also appreciate the clarification of FS's work to consult with federally-recognized tribal governments interested in the project.

Thank you for the opportunity to comment on the final EIS and ROD. Please feel free to contact Jennifer Curtis of my staff at (907) 271-6324 or curtis.jennifer@epa.gov with any questions that you may have.

Sincerely,

/s/ Christine B. Reichgott, Manager Environmental Review and Sediments Management Unit